

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FUND LIQUIDATION HOLDINGS LLC, as assignee
and successor-in-interest to FrontPoint Asian Event
Driven Fund L.P., on behalf of themselves and all oth-
ers similarly situated,

Plaintiff,

v.

CITIBANK, N.A., BANK OF AMERICA, N.A.,
JPMORGAN CHASE BANK, N.A., THE ROYAL BANK
OF SCOTLAND PLC, UBS AG, BNP PARIBAS, S.A.,
OVERSEA-CHINESE BANKING CORPORATION
LTD., DEUTSCHE BANK AG, CREDIT AGRICOLE
CORPORATE AND INVESTMENT BANK, CREDIT
SUISSE AG, STANDARD CHARTERED BANK, DBS
BANK LTD., UNITED OVERSEAS BANK LIMITED,
AUSTRALIA AND NEW ZEALAND BANKING
GROUP, LTD., THE BANK OF TOKYO-MITSUBISHI
UFJ, LTD., THE HONGKONG AND SHANGHAI
BANKING CORPORATION LIMITED, AND JOHN
DOES NOS. 1-50,

Defendants.

Docket No.: 1:16-cv-05263-AKH

**STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING
FOR PLAINTIFF'S MOTION FOR
LEAVE TO AMEND AND FILE THE
PROPOSED FOURTH AMENDED
COMPLAINT**

Plaintiff Fund Liquidation Holdings LLC, defendants Australia and New Zealand Banking Group, Ltd., Bank of America, N.A., BNP Paribas, S.A., Credit Agricole Corporate and Investment Bank, Credit Suisse AG, DBS Bank Ltd., Deutsche Bank AG, MUFG Bank, Ltd. (formerly The Bank of Tokyo-Mitsubishi UFJ, Ltd.), Standard Chartered Bank, The Royal Bank of Scotland plc, UBS AG, Oversea-Chinese Banking Corporation Ltd., United Overseas Bank Limited, The Hongkong and Shanghai Banking Corporation Limited (together, “Defendants”), and proposed defendants Barclays Bank plc, Commerzbank AG, and ING Bank N.V. (together, “Proposed Defendants,” and together with Defendants, “Stipulating Defendants”), by and through their respective undersigned counsel, subject to this Court’s approval and to the reservation of rights contained below, hereby agree and stipulate as follows:

WHEREAS, on October 26, 2018, Plaintiff filed the Third Amended Class Action Complaint (Dkt. 308) against Defendants in the above-captioned action;

WHEREAS, on November 15, 2018, Defendants filed a motion to dismiss the Third Amended Class Action Complaint (Dkt. 318), which was fully briefed on December 21, 2018;

WHEREAS, on December 26, 2018, Plaintiff filed a Motion for Leave to Amend and File the Proposed Fourth Amended Complaint (Dkt. 347) (the “Motion for Leave to Amend”) that, among other things, sought to name as defendants the Proposed Defendants;

WHEREAS, in light of the upcoming New Year’s Day holiday, and the need for Stipulating Defendants to coordinate among 17 different defense counsel firms, Plaintiff and Stipulating Defendants have agreed to the below schedule to respond to the Motion for Leave to Amend;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

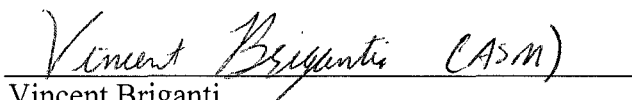
1. The time for Stipulating Defendants to file opposition memoranda, if any, to the Motion for Leave to Amend is extended to January 23, 2019.

2. The time for Plaintiff to file a reply memorandum in support of its Motion for Leave to Amend is extended to February 8, 2019.

3. No defense of any of the Stipulating Defendants to the claims in the Action, including without limitation defenses based upon lack of personal or subject matter jurisdiction, lack of standing, lack of capacity, improper venue or a defendant having been improperly named, is prejudiced or waived by the execution of, agreement to or filing of this stipulation.

4. This stipulation may be executed in facsimile or .pdf form, each of which shall be deemed an original. This stipulation, once fully executed, may be submitted to the Court without further notice to any party.

Dated: New York, New York
January 2, 2019



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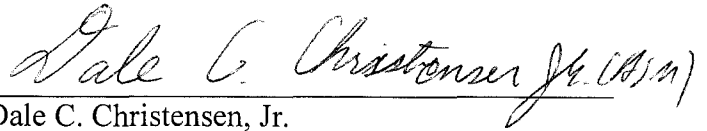
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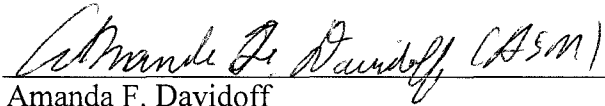
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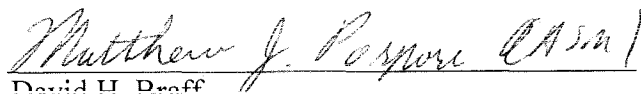
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SO ORDERED:

Dated: New York, New York
January __, 2019

Hon. Alvin K. Hellerstein
United States District Judge